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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KAJAN JOHNSON, CLARENCE DOLLAWAY,
AND TRISTAN CONNELLY, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

ZUFFA, LLC, TKO Operating Company, LLC f/k/a
Zuffa Parent LLC (d/b/a Ultimate Fighting
Championship and UFC), and ENDEAVOR GROUP
HOLDINGS, INC.,

Defendants.

Case No.: 2:21-cv-01189-RFB-BNW

**[PROPOSED] ORDER REGARDING
JOINT STIPULATION**

[PROPOSED] ORDER

This Court, having read and considered the parties' Joint Stipulation Regarding Discovery Schedule, and good cause appearing therefor,

IT IS ORDERED THAT the following schedule and deadlines¹ will apply in this matter:

Date	Event
Parties complete negotiations regarding the scope of Defendants' production.	April 23, 2025
Parties complete negotiations regarding sources of responsive documents and information and custodians.	April 25, 2025
Deadline to file motions to compel regarding disputes, if any, regarding the scope of Defendants' production, sources of responsive documents, and custodians.	April 30, 2025
Parties complete negotiations regarding search terms absent a pending motion to compel regarding disputes regarding the scope of Defendants' production, sources of responsive documents, and custodians.	April 30, 2025
Deadline to file motions to compel regarding disputes, if any, regarding search terms.	May 9, 2025
Parties substantially complete production of documents responsive to any document requests served before April 13, 2025	July 17, 2025
Deadline to propose additional search terms, sources and custodians.	October 1, 2025
Close of fact discovery, including all non-expert depositions as to all parties, including Plaintiffs, Zuffa, TKO and Endeavor	January 16, 2026
Plaintiffs' opening expert reports on class and merits	February 13, 2026
Opposition expert reports on class and merits	April 13, 2026
Plaintiffs' rebuttal expert reports on class and merits	June 8, 2026
Last day to depose each opposing parties' experts	July 10, 2026
Plaintiffs' Class Certification Motion	August 10, 2026

¹ The dates listed in April and May 2025 do not apply to Defendant Endeavor Group Holdings, Inc.

Date	Event
and All parties' <u>Daubert</u> Motions	
Defendants' Response to Class Certification and Responses to any <u>Daubert</u> Motions	September 7, 2026
Replies re: any <u>Daubert</u> Motions	October 9, 2026
Plaintiffs' Reply re: Class Certification	October 16, 2026
Any Motions for Summary Judgement	60 days after the later of (a) the Court's order on class certification, (b) if a party takes an appeal under Fed. R. Civ. P. 23(f), 45 days after an order resolving the petition to appeal or appeal (if the petition is granted and an appeal is allowed)
Responses to any Motions for Summary Judgement	60 days following the filing of the relevant Motion for Summary Judgment
Replies re: any Motions for Summary Judgment	90 days following the filing of the relevant Motion for Summary Judgment
Joint Pretrial Order	30 days following the Courts' resolution of all Motions for Summary Judgement

IT IS SO ORDERED.

DATED: This 22nd day of April, 2025.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE